

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NXP USA, INC. and NXP B.V.,)	
)	
Plaintiffs,)	
v.)	
)	
IMPINJ, INC.,)	
)	
Defendant.)	Civil Action No.: 19-1875-RGA

DECLARATION OF RAMSEY M. AL-SALAM

I, Ramsey M. Al-Salam, hereby declare as follows:

1. I am a partner with Perkins Coie LLP, in the Seattle, Washington office, and am counsel for Defendant Impinj, Inc. ("Impinj"). I have personal knowledge of the facts set forth herein unless otherwise indicated.

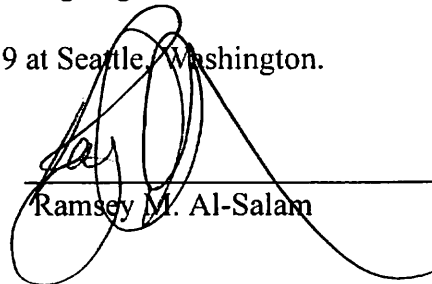
2. I am lead counsel for Impinj in this case and in a patent infringement suit filed, before this case, by Impinj against plaintiff NXP USA, Inc. in the United States District Court for the Northern District of California, styled *Impinj, Inc., v. NXP USA, Inc., Case No. 4:19-cv-03161-YGR*. This case appears to be in retaliation for that suit.

3. According to data aggregated by Lex Machina, as of November 7, 2019, there were 1,045 active patent cases pending in the District of Delaware and 39 active patent cases pending in the Western District of Washington. And, according to the United States Courts website, the District of Delaware's mean time to trial for 2019 civil matters is 32.5 months, compared to the Western District of Washington's substantially lower 19.3 months. Exhibit 1 (Federal Judicial Caseload Statistics).

4. According to Google Maps, a direct flight from Austin, Texas to Seattle, Washington takes a little over four-and-one-half hours. Exhibit 2. There are no direct flights from Austin, Texas to Wilmington, Delaware so travel to Wilmington requires a three-and-one-half-hour flight to Philadelphia, Pennsylvania, Exhibit 3, and then taking ground transportation for at least forty minutes to Wilmington, Exhibit 4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of November, 2019 at Seattle, Washington.



Ramsey M. Al-Salam